

# EXHIBIT 2

## MEMORANDUM

To:

From:

Date:

Re: Paul v. Findeisen, et al. Document Review

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### Overview

This document review project arises out of civil litigation pending in the United States District for the Western District of Texas between Plaintiff Logan Paul and Defendants Stephen Findeisen and Coffee Break Productions LLC (together, the "Parties"). This document review is being jointly requested by the Parties for the purpose of resolving a pending motion to compel filed by Paul. As explained in greater detail below, the Parties have agreed to have a neutral third-party review documents that have heretofore been withheld by Defendants based on a claim of qualified journalist privilege, and Defendants have agreed to produce the materials identified in the course of this review as potentially encompassing materials sought in Paul's motion to compel.

### Case Background

Plaintiff Logan Paul, a well-known entertainer, athlete, and entrepreneur, filed this lawsuit in June 2024. The lawsuit asserts claims for defamation against Defendant Stephen Findeisen, a journalist who publishes the results of his investigations on YouTube under the name Coffeezilla. The other Defendant, Coffee Break Productions LLC, is Findeisen's wholly owned production company.

The defamation claims concern statements that Findeisen made in 2023 and 2024 concerning Paul's involvement with a failed blockchain project called "CryptoZoo." The statements at issue include Findeisen referring to the CryptoZoo project as "Logan Paul's scam," "a scam created by Logan Paul," and a "massive con." While Paul does not dispute that the project was ultimately a failure—the blockchain game envisioned as "CryptoZoo" never came to fruition—Paul contends that it was false and defamatory of Findeisen to accuse him of operating a scam, as Paul maintains that CryptoZoo was a legitimate project, that it was conceived in good faith, and that Paul had no fraudulent intent to "scam" anyone with the project.

Findeisen contends that his statements are true or, in the alternative, expressions of opinion. At the time Findeisen published the allegedly defamatory statements, Findeisen was aware of three different active Government investigations into Paul,

CryptoZoo, and Paul's other cryptocurrency projects, and Findeisen was cooperating with the Government in those investigations. Findeisen was also aware of a class action securities fraud case that had been filed against Paul for the CryptoZoo failure.

The case is currently in discovery. A copy of Paul's Complaint is attached hereto as Exhibit A. A copy of Defendants' Amended Answer is attached hereto as Exhibit B.

### **Plaintiff's Motion to Compel**

On April 9, 2025, Paul filed a "Motion to Compel Production of Evidence Relevant to Plaintiff's Good Faith Intentions and Actions." A copy of the motion is attached hereto as Exhibit C. The motion requested that the Court compel Defendants to produce:

[T]he evidence they possessed, when they published the libels at issue in this case, reflecting Paul's good-faith and lack of fraudulent intent with respect to the CryptoZoo project. Specifically, Paul seeks any communications with sources who provided information regarding Paul's good-faith intentions, or lack of bad-faith intentions, with respect to CryptoZoo, as well as any documents, notes, drafts, or outtakes in Defendants' possession that reflect upon Defendants' understanding and knowledge as to Paul's good-faith intentions or lack of bad-faith intentions.

Thus, Paul seeks—to the extent they exist—(1) any communications between Findeisen and others in which Findeisen was told that Paul had good-faith intentions vis a vis the CryptoZoo project, or that Paul lacked bad faith or fraudulent intentions with respect to the CryptoZoo project; and (2) any communications, documents, notes, drafts, or audio or video recordings in which Findeisen expressed an understanding or belief that Paul had good-faith intentions vis a vis the CryptoZoo project, or that Paul lacked bad faith or fraudulent intentions with respect to the CryptoZoo project.

### **Document Review Objectives**

As a result of discussions aimed at resolving the motion to compel without the need for Court to hear and decide the motion, the Parties have agreed to enlist a third-party to review the materials in Defendants' possession and to determine which materials, if any, fall within the scope of what is being sought in Paul's motion to compel.

Thus, the objective of the review is to identify those materials that, in the reviewer's judgment, can be fairly described as "communications with sources who provided information regarding Paul's good-faith intentions, or lack of bad-faith intentions, with respect to CryptoZoo, as well as any documents, notes, drafts, or outtakes in Defendants' possession that reflect upon Defendants' understanding and

knowledge as to Paul's good-faith intentions or lack of bad-faith intentions," and to tag any such materials as "Responsive." Any materials that do not fall within that scope should be tagged as "Non-responsive."<sup>1</sup>

The parties recognize that this task will involve the exercise of judgment on the part of the reviewer. Responsive materials will not necessarily include the specific phrases "good-faith," "lack of bad faith," or lack of "fraudulent intent." With respect to communications between Findeisen and others, the reviewer will need to determine if what was conveyed to Findeisen, in sum and substance, was that there was a lack of bad faith or fraudulent intent on the part of Paul as it relates to the CryptoZoo project, regardless of whether those exact words or phrases were used. Similarly, with respect to Findeisen's notes, drafts, and recordings, the reviewer will need to determine if any of the materials reflect, in sum and substance, Findeisen expressing an acknowledgment, belief, or understanding that Paul acted in good faith or with a lack of bad faith and/or fraudulent intent, regardless of whether those exact words or phrases appear in the file being reviewed.

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<sup>1</sup> This project does not include any review for privilege.